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Interim Co-Lead Counsel for Plaintiff Class

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:
ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**DECLARATION OF LISA J.
CISNEROS IN SUPPORT OF
PLAINTIFFS' JANUARY 9, 2014
ADMINISTRATIVE MOTION TO
SEAL, PURSUANT TO CIVIL LOCAL
RULE 79-5**

1 I, Lisa J. Cisneros, declare:

2 I am an associate in the law firm of Lieff, Cabraser, Heimann & Bernstein, LLP, a
3 member of the State Bar of California, and am admitted to practice before the United States
4 District Court for the Northern District of California. I am one of the counsel for Plaintiffs in this
5 action. I make this declaration based on my own personal knowledge. If called upon to testify, I
6 could and would testify competently to the truth of the matters stated herein.

7 1. Attached hereto as **Exhibit A** is a true and correct copy of the redacted version of
8 Plaintiffs' Motion to Exclude Expert Testimony Proffered By Defendants And Memorandum of
9 Law In Support.

10 2. Attached hereto as **Exhibit B** is a true and correct copy of an unredacted version of
11 Plaintiffs' Motion to Exclude Expert Testimony Proffered By Defendants And Memorandum of
12 Law In Support.

13 3. Below is a list of the documents that Defendants have designated as confidential
14 material, as well as the identity of the party that has designated the material as confidential.
15 Where Defendants Adobe, Apple, Google and Intel have together designated a document as
16 confidential, I have stated that all Defendants have done so:

17 **I. Defendants' Expert Reports**

18 4. All Defendants have designated the Expert Report of Elizabeth Becker, Ph.D.,
19 November 25, 2013 as CONFIDENTIAL – ATTORNEYS' EYES ONLY.

20 5. Adobe has designated the Expert Report of David Lewin, Ph.D., November 25,
21 2013, as CONFIDENTIAL – ATTORNEYS' EYES ONLY.

22 6. Apple has designated the Expert Report of Professor Kevin M. Murphy, November
23 25, 2013, as CONFIDENTIAL – ATTORNEYS' EYES ONLY.

24 7. Intel has designated the Expert Report of Edward A. Snyder, Ph.D., November 25,
25 2013, as CONFIDENTIAL – ATTORNEYS' EYES ONLY.

26 8. Intel has designated the Amended Expert Report of Edward A. Snyder, Ph.D.,
27 December 6, 2013, as CONFIDENTIAL – ATTORNEYS' EYES ONLY.
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